

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212-763-0883

DIRECT EMAIL shecker@kaplanhecker.com

May 11, 2022

Via ECF

The Honorable John G. Koeltl
United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Roche Freedman LLP v. Jason Cyrulnik*, No. 1:21-cv-1746 (S.D.N.Y.)

Dear Judge Koeltl:

We represent Plaintiff and Counterclaim-Defendants (the “RF Parties”) in this matter and write pursuant to the Court’s Individual Practices Rule VI.A.2 in response to Defendant Jason Cyrulnik’s May 9, 2022, letter requesting permission to file under temporary seal an exhibit to his letter in response to the RF Parties’ May 4, 2022, letter raising a discovery dispute concerning his initial disclosures. (*See* Dkt. No. 116.)

The RF Parties respectfully request that the Court seal the information that Defendant sought to seal temporarily. That information concerns confidential agreements between the RF Parties, their clients, and funders, including specific information about client fee arrangements. (*See* Dkt. No. 118-1.) The Court has previously granted the parties’ requests to seal substantially similar information. (*See, e.g.*, Dkt. Nos. 30, 52, 71, 99, 111.)

Thank you for your consideration.

Respectfully,



Sean Hecker

cc: Counsel of Record (via ECF)